

States Working Group **Summary List of Ideas**

The purpose of this summary list is to provide meaningful examples of ideas for changing the Consolidated Plan process as developed by the CPIO States Working Group. These ideas are being forwarded to the CPIO Steering Committee with the ultimate objective of forwarding to HUD's Assistant Secretary of Community Planning and Development for possible action. These ideas relate to changes that may be administrative, regulatory or statutory in nature.

Summary List of Ideas

1. **Focus of ConPlan** – HUD must rethink ultimate focus of ConPlan process. Especially appropriate as it relates to reporting accomplishments, which too often focus on outputs in a disjointed way—'x' funds expended on <80% median income families—versus quality of life improvement to program beneficiaries. Discussion: ConPlan's original intent was to meet the needs of program beneficiaries, and to aggregate results of grantee accomplishments into a national data roll-up. Results-oriented reporting presents a major shift in the way HUD wants formula grant program accomplishments reported, as it has been output-oriented since 1974.

One State commented that you cannot report "improving quality of life" in IDIS!
2. **Is the ConPlan a Plan or an Application?** – States believe the ConPlan should be 1) an application for federal funds; 2) for HUD-funded programs only; 3) of a 10-year term, tied to census data, with a one-year action plan updating a) State method of distribution, b) program data, as applicable; and c) the SF 424 form. Discussion: Because of state role as grantor agency, it is not meaningful to provide needs data on a statewide basis, nor provide place-based data. This information is too broad and not meaningful as the most important needs of local governments are expressed annually when their applications are submitted. States want ConPlan submission to relate only to those items for which State will provide funding, e.g., rural development; water projects; environmental.

Another idea forwarded was if the ConPlan term is changed to 10 years, the provision of a progress report to HUD at five years.

3. **ConPlan Reporting** – States would report 1) on HUD-funded activities only; and 2) on achieving overall statewide goals using all State resources. Discussion: redefine reporting requirements to be more meaningful; states suggest using reporting characteristics based on national objectives. It is more meaningful to report quality of life improvements made in making utility payments more affordable to a low-income family through infrastructure improvements, for example, than reporting that a grantee agency installed 1,000 feet of sewer line. Do not report on broader societal goals over which States have little or no control over outcome measure. As such, focus on 'results'

"Results-reporting" should be at a State level, with HUD working with a public interest group to survey grantees to report commonalities and to report HUD's national goals to Congress....do not attempt to capture through HUD program reporting requirement.

reporting' vs. 'performance reporting'. States want to get back to reporting against original statutes/goals of four formula grant programs. For example, a HOME program goal is to increase the supply of affordable housing stock for LMI persons. State would report on creation / preservation of a specified amount of affordable units over ten-year and each year report toward achieving that Action Plan. Example possible performance State reporting to

Question: Why aren't the accomplishments of States being reported completely to Congress and OMB?

ConPlan term, on progress made goal in Annual provided below of indicators for HUD.

Activity	Performance Indicators	Meets HUD Objective
Public Facilities / Water Quality	State CDBG funding makes utility rate affordable to LMI family under USDA Rural Development loan*	Suitable Living Environment
Economic Development	25 jobs created	Create Economic Opportunities
Housing Rehabilitation	50 units rehabbed	Provide Affordable Housing
Homelessness	12 transitional units created	Reduce Chronic Homelessness

Figure 1 – Reporting Characteristics

* Note: report as CDBG providing gap financing to LMI persons

4. **HUD Definitions** – HUD must provide further guidance on definitions, including:
 - a. Families vs. Households
 - b. Units vs. Beds
 - c. Income categories, e.g. low-income
 - d. Chronic homelessness
5. **Citizen Participation** – permit States to meet CP requirement through convening of advisory committees in lieu of public hearing requirement held by State. Discussion: more meaningful at State level.
6. **Supportive Housing** – permit States to meet this narrative requirement for supportive housing activities by substituting Continuum of Care information, as available—even if not statewide.
7. **Data Collection** – reduce burden placed on States to collect data on planning (front-end) and reporting stages (back-end). Requirements of data in the ConPlan should be limited to what is required by the statute. States should be able to provide narrative that supports the need expressed by data provided by HUD—some States actually use their own data. States should not be required to return tables of raw data to HUD. Reporting accomplishments should be made easier through redesigned HUD systems.
8. **Flexibility of HUD Funds** – maintain program flexibility, which is greatest asset of HUD funds. Discussion: States recognize that by its nature, flexibility makes it difficult to precisely define performance indicators. Example provided of two local utility companies joining together to become regional company, thereby creating

economy of scale to save public funds in program efficiencies and operating savings, which translated into lower utility bills for LMI customers.

9. **Eliminate the Following Required Elements of ConPlan:**

- a. **Anti-Poverty Strategy** – Discussion: States are not in control of locally-implemented activities that may reduce the number of people with incomes below the poverty level.¹
- b. **Lead-Based Paint Certification** – Discussion: as grantor agency, this requirement should be made of local program implementers only.
- c. **Interagency Coordination** – Discussion: at state level, extremely difficult for lead agency that prepares ConPlan to achieve interagency coordination for other program areas other than to submit the ConPlan.
- d. **Consistency with Public Housing Agency Plans** – Discussion: see comments for items b. and c. above.
- e. **High, Medium and Low Priority Needs Designation** – Discussion: This is a regulatory requirement not required by statute. Resources are too limited to differentiate between these levels of need, i.e. insufficient funds available to address needs below “high” priority.

¹ See 42 U.S.C 12705 (b)(19)